

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ANDREW G. MCCABE.,

Plaintiff,

v.

WILLIAM P. BARR, in his official capacity
as Attorney General of the United States, *et*
al.,

Defendants.

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) Case No. 1:19-CV-2399-RDM
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UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants hereby seek a two-week extension of the deadline to answer or otherwise respond to the Complaint. The proposed extension would move the response deadline from October 18, 2019 to November 1, 2019. Plaintiff does not oppose this motion. The bases for this motion are provided below.

1. Mr. McCabe was the Deputy Director of the FBI until his removal on March 16, 2018.
2. In August of 2019, Mr. McCabe filed this suit, challenging his removal under various regulatory, statutory, and constitutional provisions. *See* Compl., ECF No. 1.
3. The deadline to respond to the Complaint is currently October 18, 2019. Defendants have not previously sought an extension of this deadline.
4. Defendants anticipate appending a modest number of documents to their response to the Complaint.
5. Defendants have worked diligently to review and redact these documents to ensure that they do not contain information that is unsuitable for release to the public, such as sensitive

law-enforcement information. However, Defendants anticipate requiring additional time to complete that task.

6. Plaintiff does not oppose this motion for an extension of time, but reserves the right to object to any attachments to Defendants' response.

Accordingly, for good cause shown, the Court should extend the deadline to answer or otherwise respond to the complaint from October 18, 2019 to November 1, 2019.

Dated: October 14, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

CHRISTOPHER R. HALL
Assistant Branch Director

/s/ Justin M. Sandberg

JUSTIN M. SANDBERG

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[PROPOSED] ORDER

The Court, having considered Defendants' Unopposed Motion for Extension of Time to Respond to Complaint, hereby GRANTS the motion, extending the deadline to answer or otherwise respond to the Complaint from October 18, 2019 to November 1, 2019.

IT IS SO **ORDERED**, this _____ day of _____, 2019.

HON. RANDOLPH D. MOSS
United States District Judge